



**Environmental
Protection Agency**

John R. Kasich, **Governor**
Mary Taylor, **Lt. Governor**
Scott J. Nally, **Director**

Re: Crawford County
Carter Machine Co., Inc.
Premise # 0317030054
Notice of Violation (NOV) – Non HPV

May 7, 2012

CERTIFIED MAIL

Mr. Brian Rinehart
Carter Machine Company, Inc.
820 Edward Street
Galion, Ohio 44833

Dear Mr. Rinehart:

This letter shall serve as follow-up to Ohio EPA's review of the 2011 Annual Permit Evaluation Report (PER) for the Carter Machine Co., Inc. Crawford County facility, located at 820 Edward St. in Galion, Ohio, received February 14, 2012. In this report, deviations or exceedances from the operational restrictions or emission limitations of Permit to Install and Operate (PTIO) #P0086862, issued July 5, 2011, were noted for emissions unit P001 (5 hard chrome plating tanks with a composite mesh pad system). As a result of Ohio EPA's review of the PER report and the company's files, the following violations were discovered:

1. Pressure drop readings for the composite mesh pad system serving emissions unit P001 exceeded the allowable level of six inches of water, 18 times during the calendar year 2011. The following specifies the dates when pressure drop exceedances occurred: 01/18, 02/14, 02/15, 03/16, 03/17, 10/24, 11/01, 11/16, 11/17, 11/30, 12/01, 12/02, 12/05, 12/06, 12/14, 12/15, 12/16, and 12/23. A review of the company's file shows additional reports with indications that the emissions unit was operated with pressure drop readings above the permitted pressure drop range.

Each instance where the pressure drop for the composite mesh pad system operated in exceedance of the permissible pressure drop value is a violation of OAC rule 3745-31-05(A)(3), 40 CFR Part 63 Subpart N, and Ohio Revised Code (ORC) 3704.05.

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In order to bring the company into compliance with applicable state and federal regulations, the company must submit a compliance plan to explain how the company will correct the violations and prevent them from occurring in the future. The company's written response to this letter is requested by May 31, 2012, and it should be submitted to my attention at the Ohio EPA, Northwest District Office.

Ohio EPA has an Office of Compliance Assistance and Pollution Prevention (OCAPP) that may be able to assist you in coming into compliance. Additional information about this office is available at their website at <http://www.epa.state.oh.us/ocapp/ocapp.html>. The NWDO representative of OCAPP is Mr. Ron Nabors who can be contacted by phone at (419) 373-3147 or by e-mail at ron.nabors@epa.state.oh.us.

Please note that the submission of information to respond to this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make the decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

If the company has any questions and/or comments concerning this letter, please contact me at the above address, by calling (419) 373-3113, or via e-mail at peggy.argabright@epa.state.oh.us.

Sincerely,



Peggy Argabright
Division of Air Pollution Control

/cg

ec: William MacDowell, U.S. EPA Region V
Tom Kalman, DAPC – CO
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